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**SFUND RECORDS CTR
2390522**

March 27, 2019

Ms. Kim Muratore, Case Developer (SFD-7-5)
U.S. EPA
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: CERCLA Section 104(e) Information Request Letter
Orange County North Basin Study Area, Orange County, California

Dear Ms. Muratore:

In responding to EPA's December 14, 2018 CERCLA Section 104(e) Request Letter ("Request"), Benchmark Electronics Manufacturing Solutions, Inc. ("Benchmark") is answering all questions on behalf of itself.

Initially we note that the Request defines the "Company" collectively as Benchmark and Aeroscientific Corp., an alleged former subsidiary of Benchmark Electronics Manufacturing Solutions, Inc. (f/k/a, Smtex International, Inc.). For clarification, Aeroscientific Corporation is not a former subsidiary of Benchmark Electronics. Further information confirming this point is provided in response number two to the Information Requests below.

Based upon review of its records, Benchmark has reached the following conclusions:

- (1) Benchmark never acquired any real property located at 184 East Liberty Avenue, Anaheim, California, (the "Facility"), nor did it conduct any operations at this Facility.**
- (2) Benchmark has no direct or successor liability for the Facility. Although Benchmark acquired the stock of CTS Electronics Manufacturing Solutions, Inc. in 2013, a wholly-owned subsidiary of CTS Corporation, the acquisition did not include the real property at the Facility. Moreover, because CTS Corporation disclosed in due diligence its prior correspondence with the EPA concerning Aeroscientific Corp. and the Facility, the acquisition expressly excluded any and all liabilities associated with Aeroscientific Corp. and the Facility.**

Each of these conclusions is explained and incorporated into the following responses to the thirty-one questions included in the Information Request. Please note that Benchmark has concluded it possesses no documents responsive to the Information Requests below.

Responses to Enclosure B: Information Request

1. Identify the person(s) answering these questions on behalf of the Respondent.

Within Benchmark Electronics Manufacturing Solutions, Inc. ("Benchmark," or "Company"), the primary responsibility for answering these questions was assigned to Victor Harris, Associate General Counsel, Chief Compliance Officer. Given the breadth of the questions and the fact that answering them required a significant amount of research and investigation into Benchmark's files, Mr. Harris was assisted by several of his direct reports. Benchmark also retained the law firm Pillsbury Winthrop Shaw Pittman LLP to provide legal advice in connection with EPA's request for information, and Mark Elliott and Rebecca Lee of that firm helped prepare the answers to these questions.

2. Identify the dates the Company, under any of its current or former business structures, owned and/or operated the facility located at 184 East Liberty Avenue, Anaheim, California, (the "Facility").

To the best of its knowledge after performing a diligent search and review of its records, Benchmark has never, under any of its current or former subsidiary business structures, owned and/or operated the Facility.

The Facility, located at 184 East Liberty Avenue, Anaheim, California was the prior location of Aeroscientific Corp. a circuit board manufacturing facility closed in approximately 1991. At the time of closure, Aeroscientific Corp. was a subsidiary of Data-Design Laboratories Inc. The property itself was under lease to Aeroscientific Corp. and owned by Bradmore Realty Investment Company. Aeroscientific Corp. filed for Chapter 7 Bankruptcy in the United States Bankruptcy Court, for the Central District of California in 1998 (Case No, SC 98-25792 KL). As noted in the "Report of Trustee in Chapter 7 No Asset Case" filed January 20, 1999, the company had no assets. The court subsequently discharged the Trustee and closed the bankruptcy case on the same date.

The U.S. EPA has been operating under the misperception that CTS Electronics Manufacturing Solutions, Inc., a subsidiary of CTS Corporation, which acquired Smtex International, Inc in January 2005 bore some liability for the Facility. In fact, as previously demonstrated in response to information requests regarding the Omega Chemical Corporation Superfund Site and the Operating Industries Inc. Superfund Site that is not the case. Data-Designs Laboratories was a guarantor of the lease, though it did not itself own or operate at the Facility. Smtex International, Inc was successor to Data-Designs Laboratories and therefore also became a guarantor. However, CTS Electronics Manufacturing Solutions, Inc. (f/k/a Smtex International, Inc.) assumed no liabilities of Aeroscientific Corp.

Similarly, Benchmark has no direct or successor liability for the Facility. Benchmark acquired the stock of CTS Electronics Manufacturing Solutions, Inc. in 2013, a wholly-owned subsidiary of CTS Corporation. The acquisition did not include the real property at the Facility. Moreover, because CTS Corporation disclosed in due diligence its prior correspondence with the EPA concerning Aeroscientific Corp. and the Facility, the acquisition expressly excluded any and all liabilities associated with Aeroscientific Corp. and the Facility.

3. Identify the individuals who are or were responsible for environmental matters at the Facility during its operation at this address.

To the best of its knowledge after performing a diligent search and review of its records, Benchmark does not currently possess knowledge about the identities of the individuals who were responsible for environmental matters at the Facility before Aeroscientific Corp. declared bankruptcy in 1999.

4. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the creation, use, storage, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate.

To the best of its knowledge after performing a diligent search and review of its records, Benchmark does not currently or formerly employ any individuals who have knowledge of Benchmark's or Aeroscientific Corp.'s operations at the Facility that relate to the creation, use, storage, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate.

5. Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the physical layout of each operational area of the Facility, who could explain the day-to-day flow of the operations, or who know the location of physical features such as clarifiers, degreasers, and above- and below- ground storage tanks.

To the best of its knowledge after performing a diligent search and review of its records, Benchmark does not currently or formerly employ any individuals who have knowledge of Aeroscientific Corp.'s operations at the Facility or otherwise who could explain the day-to-day flow of the operations, or who know the location of physical features such as clarifiers, degreasers, and above- and below-ground storage tanks.

6. Explain the Company's present corporate status as well as its operational status.

Benchmark is currently active and operating. Benchmark is based in Tempe, Arizona.

7. Provide the date and in which State the Company was incorporated, formed, or organized.

Benchmark Electronics, Inc. was incorporated on October 21, 1981 and was incorporated in Texas.

8. **Identify the time period during which Aeroscientific Corp. was operated as a subsidiary of Benchmark Electronics Manufacturing Solutions, Inc. (f/k/a, SMTEK International, Inc.).**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark confirms that Aeroscientific Corp. never operated as a subsidiary of Benchmark. Please see our response to information request number 2 above for a more complete corporate history.

9. **Identify the business structure under which the Company currently exists or operates, and identify each business structure under which it existed or operated while at the Facility location.**

Benchmark has not found and is not aware of any evidence that it ever operated at the Facility.

10. **If the Company operated at the Facility as a subsidiary, division, or other business unit, provide this information and identify where it fits into the larger company's structural organization.**

Benchmark has not found and is not aware of any evidence that Benchmark or any of its parent or subsidiary entities ever operated at the Facility.

11. **If the Company is now using or has ever used a fictitious business name while operating at the Facility, identify the fictitious names and owners of each fictitious name.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark has not found and is not aware of any evidence that Benchmark or any of its parent or subsidiary entities ever operated at the Facility, Benchmark confirms that Benchmark is not using, nor has it ever used a fictitious business name in relation to the Facility.

12. **If the Company sold the Facility property, provide the date on which the Facility property was sold and the person or entity to whom it was sold. To the extent known, indicate whether you understand whether the buyer planned to continue the same or similar business operations at the Facility as that conducted by the Company.**

Benchmark has not found and is not aware of any evidence that Benchmark has either owned or sold the real property at the Facility.

13. **If the Facility was operated by other parties prior to the Company's operations, identify the prior operators and describe those previous operations to the extent known. Describe any changes made to operations by**

the Company after it began operating at the Facility that changed the use or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate.

Benchmark has not found and is not aware of any evidence that Benchmark never owned or operated the Facility. The only identified operator of the Facility known to Benchmark, upon information and belief based solely upon CTS Corporation's correspondence with the EPA, is Aeroscientific Corp., a bankrupt entity.

- 14. For any period of time in which the Company owned the Facility under any of its current or former business structures and leased the Facility, provide the name, address, and phone number of any tenants and/or lessees.**

Benchmark has not found and is not aware of any evidence that Benchmark has either owned or operated the Facility.

- 15. For any period of time in which the Company under any of its current or former business structures operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner and/or lessor.**

Benchmark has not found and is not aware of any evidence that Benchmark has either owned or operated the Facility.

- 16. Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and any product manufactured or services performed at the Facility. Describe any significant change in Facility size, the Company's number of employees, and the products manufactured, or services performed over time.**

Benchmark is unaware of the size of the Facility. Media publications contemporaneous with the closure of the circuit board manufacturing facility in 1991 indicated that the company would lay-off 180 employees.

- 17. Provide a map of the Facility showing the locations of buildings and significant features on the property at the time that the Company operated at the Facility. Indicate the locations of any maintenance shops, machine shops, degreasers, clarifiers, plating areas, painting areas, cooling towers, liquid waste tanks, chemical storage tanks, and fuel tanks.**

Benchmark has not found and is not aware of any evidence that Benchmark has either owned or operated the Facility. Benchmark is not currently in possession of a map that shows the processes and locations of buildings related to the Facility.

- 18. Indicate on a map of the Facility or in narrative form each location where any of the following chemicals were used, stored, generated, spilled or disposed of: PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark does not have any knowledge about the use of any of the above chemicals.

19. **Provide copies, both originals and updates, of hazardous material business plans and chemical inventory forms submitted to city, county, and/or state agencies for the Facility.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark is not in possession of, nor does it have access to, any hazardous material business plans submitted for the Facility on behalf of Aeroscientific Corp.

20. **Provide a list of all chemicals and hazardous substances used at the Facility that contained any of the following: PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark does not have any knowledge about the use of any of the above chemicals.

21. **Identify and provide information about any PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate used or transported to or from the Facility.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark does not have any knowledge about the use or transport of any of the above chemicals.

22. **Provide copies of all investigation and sampling reports containing environmental data or technical or analytical information regarding soil, water, and air conditions at the Facility, including but not limited to, data or information related to soil contamination, soil sampling, soil gas sampling, indoor air sampling, geology, groundwater, surface water, and hydrogeology.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark is not currently in possession of reports related to activities at the Facility.

23. **Identify and provide copies of all agency orders, correspondence, and/or workplans regarding any soil, soil gas, indoor air, and/or groundwater sampling at the Facility that was ordered or agreed to be performed, but that was never completed.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark does not have any knowledge about any workplans or agency orders that were agreed to but never completed.

24. **Provide copies of any due diligence reports or property transfer assessments related to the Facility.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark is not currently in possession of records of due diligence or property transfer assessments related to the Facility.

- 25. Identify, and provide the following information for, all groundwater wells located at the Facility.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark is not currently in possession of reports related to groundwater wells at the Facility.

- 26. Provide copies of any applications for permits or permits received for the Facility under any local, state, or federal environmental laws and regulations, including any waste discharge permits.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark is not currently in possession of reports related to applications for permits or permits received for the Facility.

- 27. For each waste stream generated at the Facility, identify the waste and describe the procedures of (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark is not currently in possession of information related to waste at the Facility.

- 28. If the Company discharged any of its waste stream at the Facility to the sewer identify all locations where waste streams were discharged and provide copies of all permits and all analyses performed on discharged water.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark is not currently in possession of information related to the discharge of waste streams at the Facility.

- 29. Describe the method(s) used by the Company to remove waste streams from sumps at the Facility.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark is not currently in possession of information related to the discharge of waste streams at the Facility.

- 30. Identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark is not currently in possession of information related to leaks, spills or other releases of pollutants at the Facility.

- 31. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate at the Facility.**

To the best of its knowledge after performing a diligent search and review of its records, Benchmark is not currently in possession of correspondence with state and federal agencies regarding the use, handling or disposal of chemicals at the Facility.

Best regards,



Victor L. Harris
Associate General Counsel

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